

UHF stations are inherently handicapped by channel position, audience viewing habits and perception and technical characteristics, yet face the same competitive obstacles as their more powerful established VHF competitors. Creating a television duopoly exception for UHF stations will permit these smaller and generally less successful stations to operate in a more efficient and cost-effective manner. It will facilitate diversity by permitting those UHF stations with a specialized format to continue to respond to the particular concerns of otherwise unserved groups of viewers. It will similarly facilitate competition by enabling once-weak stations to compete effectively not only with other television and radio stations but with their multichannel competitors.<sup>38/</sup>

The public interest supports a limited exception to any new television duopoly rule that permits UHF/UHF combinations. UHF stations are almost inevitably the weakest stations in their markets, and permitting two such stations to be commonly owned not only would not detract from competition and diversity, but would contribute to those goals by creating stronger competitors that are able to provide more and better public interest programming.

### **Conclusion**

The Commission's decision in this important rulemaking proceeding must reflect the practical realities of television station operation in the contemporary communications marketplace. It must recognize that this marketplace is not limited to broadcast stations, but encompasses a vast variety of old and new media. In that dynamic environment, ownership

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<sup>38/</sup> If UHF stations can become stronger as the result of duopoly ownership, this will have the added benefit of creating a viable station base for creation of additional new networks.

restrictions are an unnecessary anachronism. To the extent that the Commission feels compelled to continue to encumber television licensees with ownership limitations, those limitations should, at least, reflect the practical realities of station operation. In particular, if the Commission decides to regulate television LMAs, relationships created pursuant to existing LMAs like that involving WDRB and WFTE must be grandfathered and transferable. Further, UHF-UHF combinations in the same market must be permitted.

Respectfully submitted,

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Exhibit No. 1

## WFTE EQUIPMENT LIST

WFTS-TV  
EQUIPMENT LIST

Studio

2 ea.	Antenna Development 16 foot Sat. Dishes
6 ea.	JVC-TM918U 9" Color Monitors
4 ea.	JBL Pro III Speakers
1 ea.	Winstead Horseshoe Console
8 ea.	Winstead 6' Vertical Racks
8 ea.	ADC HUM-1 Humbuckers
4 ea.	386 PC Computers
1 ea.	486 PC Computers
4 ea.	Video Tek TVM 675
1 ea.	TFT EBS-886 EBS Receiver
200 ea.	King 1345-3-36 75 ohm terminator
4 ea.	Sescom Audio Line XMFRS
1 ea.	12 GHz Microwave System-Microwave Radio Corp.
6000'	Belden 8281 Coax
2 ea.	Xcelite TC 150 Tool Sets
1 ea.	Pioneer VDR-V1000 Video Disc Player/Recorder
2 ea.	Chaparral 100C Sat. Receivers
1 ea.	Tektronix 1910 Generator
1 ea.	Utah Scientific MC 500 Switcher & Router
24 ea.	Ward Beck Stereo Audio DA's
1 ea.	Odetics SCS600 Cart Sequencer
2 ea.	JVC 822 SVHS Decks
2 ea.	Tektronix SPG 170A Sync Generator
1 ea.	Tektronix ECO 170A Sync Switch
3 ea.	Video Tek Studio 13, Color Monitor
3 ea.	Sony PVM 411-Quad B/W Monitor
4 ea.	JVC TM 9008U Color-Monitor
14 ea.	JVC BR5622U SVHS Machine
2 ea.	Sony VO 5800 3/4" Recorder/Player
2 ea.	Digital DPS 220 TBC
1 ea.	Sony PVM 2600 Beta Cam Player
2 ea.	Digital DPS 265 4 Field Frame Sync
3 ea.	Crown D75 Amplifier
1 ea.	Tascam 32 2 Track Reel Recorder
1 ea.	Comprehensive Video PC-2 Character Generator
1 ea.	ITC Delta 35 Stereo Cart Player
1 ea.	TVM 730 Videotek Video Analyzer
1 ea.	Panasonic KX50 Fax Machine
1 ea.	ESE 199 Master WWV Clock
1 ea.	Grassvalley 3240 Proc Amp W/AGC
2 ea.	CRL SGC 800 Audio Processors
1 ea.	Video Tek APM-800 Audio Monitor
3 ea.	Video Tek 10X1 RS10A Switcher
1 ea.	IBC (Link Electronics) 835 Phasemeter
2 ea.	Video Tek Omni Frame
24 ea.	Video Tek VDA18P Video DA
1 ea.	Video Tek Times Six Black Burst Generator
3 ea.	ADC Video Patch Panel

Studio Equipment List (Cont.)

3 ea.	ADC Audio Patch Panel
1 ea.	Panasonic WV-F 250 BH Color CCD Camera
500 ea.	Sony MQST30 SVHS Video Tape
1 ea.	Shure FP 42 Mixer
1 ea.	Bogen 3133 Tripod & Head
1 ea.	Bogen 3056 Dolly
1 ea.	Electro-Voice 635A Microphone

Transmitter

1 ea.	Andrew Trasar Antenna
900'	Andrew HRL 600-3 6 1/8" Line
1 ea.	Andrew MT 300 Dehydrator
1 ea.	Harris Sigma Series HD 60C2 Common Amplification, Liquid Cooled, IOT UHF Transmitter
1 ea.	Control Concepts Isolatron Surge Protector
1 ea.	Hiptronics 3 Phase Regulator
2 ea.	Tektronix 1450-1 & TDC Demod
2 ea.	Belar Stereo Audio Modulation Monitors
1 ea.	CRL Stereo Generator/Limiter
1 ea.	CRL DX2 Stereo Noise Reducer
1 ea.	Harris DC 126 Sentinel Remote Control

Exhibit No. 2

WFTE CABLE CARRIAGE

### **WFTE CABLE SYSTEM INFORMATION**

<b><u>MSO</u></b>	<b><u>HEADENDS</u></b>
TKR Cable	Louisville
Insight Communications	Jeffersonville, Sellersburg, IN; Buckner, Bedford
Marcus Communications	New Albany, IN
TeleScripps Cable Co.	Elizabethtown, Campbellsville, Leitchfield, Hodgenville
TeleCable of Radcliff	Radcliff
TCI	Shepherdsville, Brandenburg
Charter Communications	Shelbyville, Eminence
Marcus Communications	Seymour, IN
American Cable Entertainment	Madison, IN; Lebanon, Carrollton
Bardstown Cable TV	Bardstown
Falcon Cable TV	Scottsburg, Pekin, Henryville, IN
TCI	Salem, IN
Tele-Media Company	French Lick, Marengo, IN; Hardinsburg, Cloverport, Irvington, KY
Enstar Cable	Greensburg
Clear Cable TV	Bardstown, Willisburg
Derbytown Communications	Bullitt County
TCI	Taylorsville, Lebanon Junction, Bloomfield, Mount Washington
Rapid Cable	Caneyville, McDaniels, Upton, Big Clifty

C'Burg Cable TV

Campbellsburg, Medora, IN

Falcon Cable TV

Bradfordsville

Regional Cable TV

Hardinsburg, Dupont, Elizabeth,  
Leavenworth, Freetown, IN;  
Barrellton, KY

Community Cable Service

Franklin County